



Shouldham Neighbourhood Plan Steering Group Ordinary Meeting Minutes

Monday, 16th February 2026

at 19:30, 2 Willow Court, Shouldham

Present: Ant Hobbs (Chair), Tim Owen (vice Chair),
David Willis (Secretary), Helen Brown, Rose Hipperson

Apologies: Sarah Sheldon (PC Chair)

Absent: None

Others in Attendance: None

133/26 Opening and apologies:

AH opened the meeting for which there were apologies from Sarah Sheldon PC Chair.

134/26 Declarations of interest:

None.

135/26 To welcome the PC chair

The chair was not able to attend the meeting.

136/26 To agree the minutes of the meeting held on 11th November 2025 and the notes from the online meeting held on 27th November 2025

The minutes of the meeting held on 11th November 2025 and the notes from the subsequent online meeting held on 27th November 2025 were AGREED. [The online notes are attached as an appendix].

137/26 To review outstanding actions from previous meetings

- A. To format and review the LGS assessment v3 document
(Action completed - see item 139/26)
- B. To receive and review an updated Plan [v9]
(Action completed - see item 140/26)
- C. To receive a draft leaflet from CCP announcing a public consultation
(Action ongoing - see item 130/25)
- D. To receive a draft presentation from CCP for public consultation and meeting
(Action ongoing - see items 119/25 and 130/25)
- E. To receive confirmation that an online smart survey is available
(Action ongoing - see item 130/25)

- 138/26 **To receive any verbal updates from Steering Group members for ongoing matters which are not covered as separate agenda items.**

None

- 139/26 **To consider the response from the Borough Planning Officer KLWNBC (dtd 27-01-26), in respect of the actions that arose from the online meeting held on 27th November 2025.**

The response from the Borough Planning Officer was discussed at length. The conclusion was reached that the concerns of the members of the SG had not been satisfactorily answered with regards to personal liability in law. SG members expressed disappointment that:

1. despite pursuing a planning objective set down in legislation and following professional guidance at all times; and
2. having been appointed by the Parish Council to achieve the objective, they now find they are not covered by the PC's indemnity insurance; and,
3. the Borough Council, being the final party which had authority to approve a neighbourhood plan, was not able or willing to provide legal support or indemnity to SG members.

This has resulted in members feeling vulnerable and exposed in a manner that was not appreciated when the SG was formed.

SG members felt pressured to withdraw proposals for which objections had been received even though they believed that decision should be made by the Borough Council, which is the highest level of authority able to approve or reject the whole plan or elements of it. Instead ultimate responsibility to resolve potential conflict is being devolved to ordinary parishioners who work in a volunteering capacity.

There was a concern that if contentious proposals were to be withdrawn, some people who had contributed in early public consultations might be unhappy that their views were being over-ridden so early in the process.

Each member reflected upon their own position going forward. After much discussion all members AGREED to continue progressing the Neighbourhood Plan and take it to the public consultation stage. Having removed from the draft Plan those LGSs and NDHAs for which objections had been made, the draft v10 is in effect the finalised document ready for public consultation. It was further AGREED that in view of SG members' concerns about vulnerability, should any other LGS or NDHA owner raise objections, the SG would be prepared to make further withdrawals.

It was AGREED that a copy of the notes for the November meeting and the subsequent response from the Borough Council should be appended to these minutes for clarity around the decisions that members of the SG have had to make.

- 140/26 **To review and agree the formatted LGS Assessment v3 September 2025**

The LGS Assessment had been formatted and numbered v4. It was reviewed at the meeting. It was AGREED that the LGS sites which had been withdrawn would be referenced in the document and their respective assessments attached as an appendix to the document. On the basis that DW will insert this addition and create a new document v5, the LGS Assessment was AGREED.

It was AGREED that a similar exercise will be undertaken by DW in respect of the NDHA assessment. See item 143/26 - AOB.

141/26 **To review the amended draft NHP v10 [v9 not created] document from CCP**

The draft Plan v10 was reviewed at the meeting. The LGS sites and NDHAs properties that had been withdrawn were no longer referenced in the draft Plan. A final review was made during the meeting, following which as no further changes were judged to be required, the draft Plan v10 was AGREED.

142/26 **Review of Regulation 14 preparation, including:**

- A. Identify and compile all necessary documentation for the Reg 14.

It was AGREED that Louise will advise SG on which documents should be included and **DW will compile** the documents.

- B. Consider public announcement of Reg 14 consultation via

- Leaflet drop and notice boards - AH to amend the draft leaflet once a consultation date has been set. Amendments to the leaflet will be required for the date and deletion of the reference to cycle routes. Subsequent leaflet drop to be actioned nearer to the consultation date once this is set.
- Shouldham Facebook - to be actioned later when consultation date is set.
- Email list - to be actioned later when consultation date is set.

- C. Consider how to hold pdf copies of documentation that can be electronically shared upon request from interested parties.

AH will seek agreement from the PC Chair that documentation can also be put on the PC's website in the Neighbourhood Plan folder.

DW to seek advice from CCP to understand at which stage in the consultation process will the borough council be sent copies of the documentation. It is SG's understanding that the borough council will get the documentation after the village and then the PC have been separately consulted.

- D. Creation of an online smart survey

CCP will undertake the smart survey

- E. Consider how non-electronic responses should be invited

It was AGREED that written responses will be left at the Post Office

- F. Arrange for 4 x printed copies of a set of the draft neighbourhood plan and associated documents to be distributed to:

- Bowls Club;
- Post Office;
- The King's Arms PH;
- Village Hall.

DW will contact CCP for advice on what documents are involved. SG believes the relevant documentation will comprise the Plan, the Design Code, the LGS Assessment, the Views Assessment and the SEA/HRA (assessments).

There was a discussion with regards to how the printed copies will be held/presented. It was AGREED that folders will be used and **DW will research** whether there are folders on the market that can be secured against their contents being removed or preferably the pages are bound in a similar way to a paperback book..

- G. Agree the consultation start date

Although a specific date could not yet be set, the 6 week period was likely to be during April and May with the village presentation taking place midway.

- H Arrange for a letter advising of the formal consultation to be sent to relevant home and land owners by tracked mail.
- It was AGREED that **DW will adapt** the letter templates that were used informally to notify home and land owners with appropriate text changes to reference the public consultation.
- I. Review the list of public body stakeholders (v1 June 2022)
- DW to research** who is the Post Office stakeholder representative. It was AGREED that stakeholders will include the owners of land which is outside the village development boundary.
- DW will compile** an amended list (v2) and circulate it to SG members for review and agreement outside the meeting.
- J. Prepare email notification to public body stakeholders of the Reg 14 start date.
- It was AGREED that this will be similar to the notification templates used for NDHA and LGS sites. **DW to write** a draft email for approval.
- K. Agree a date for a public presentation and make preparations for same.
- It was AGREED that when a consultation start date is set, the presentation will be arranged to take place during the 3rd week of the 6 week consultation period.

143/26 **AOB**

Although the NDHA Assessment had already been agreed, there was a discussion about referencing the withdrawn NDHAs in a similar manner to the withdrawn LGSs (see item 140/26). It was AGREED that DW will reference the withdrawn NDHAs in the template document (v10) and add their respective assessments as an appendix to an updated NDHA Assessment v11.

144/26 **Date of Next meeting:** Monday 9th March 2026.

Meeting closed at 21:00

Chair : AH
Date : 9th March 2026

Minutes prepared by:

David Willis, Secretary for the Shouldham Neighbourhood Plan Steering Group
Email: shouldham.nhp@gmail.com

APPENDIX

Copy correspondence with the Borough Planning Officer at KLWNBC



Shouldham NHP <shouldham.nhp@gmail.com>

RE: Shouldham Neighbourhood Plan discussion/ meeting (27th November 2025)

1 message

James Anandale <James.Anandale@west-norfolk.gov.uk> 27 January 2026 at 17:13
 To: [REDACTED], Shouldham NHP <shouldham.nhp@gmail.com>
 [REDACTED], James Modary <James.Modary@west-norfolk.gov.uk>
 [REDACTED], Planning Policy email <planning.policy@west-norfolk.gov.uk>

[REDACTED] NHP Members,

Just to stress a point that wasn't clarified in our first answer: I note that you've asked for legal advice from the Monitoring Officer of the Borough Council, but to be clear, the Borough Council does not provide legal advice to third party organisations on these matters. The views given below are indicative only, based on the limited information we have seen, and must not be relied upon as legal advice.

I hope nonetheless that they give you some useful pointers, and if a more serious situation arises as regards liability, I strongly urge you to consult legal advisers independently.

Best regards,

From: [REDACTED]
 Sent: 26 January 2026 08:13
 To: Shouldham NHP <shouldham.nhp@gmail.com>
 [REDACTED];
 [REDACTED];
 [REDACTED]; Planning Policy
 email <planning.policy@west-norfolk.gov.uk>
 Subject: RE: Shouldham Neighbourhood Plan discussion/ meeting (27th November 2025)

Further to your email below, please accept my apologies for not getting back to you sooner about this.

We had prepared a response to your various queries in December, following our meeting on 27th November. However, looking back it appears this was not actually sent out. Therefore, please note the written advice below, which incorporates input from the Borough Council's lead legal and historic conservation officers.

Specific advice from the Borough Council's Monitoring Officer about the legal status of the Neighbourhood Planning Group, and whether it would enjoy protection in the event that an individual/ landowner sought to take legal action against the Group (e.g. as volunteer individuals)?

A: The Neighbourhood Planning Group (NPG) was formed by Shouldham Parish Council, following the decision of the Parish Council to apply to the Borough Council for permission to designate the Parish a Neighbourhood Area, thereby allowing preparation of a Neighbourhood Plan (Neighbourhood Planning (General) Regulations 2012, Regulation 5/ 5A: <https://www.legislation.gov.uk/uksi/2012/637/contents>).

The NPG approached the landowner to engage with him about the possibility of designating some of his land as Local Green Space through the emerging Shouldham Neighbourhood Plan. However, it is understood that the landowner threatened to sue representatives of the NPG, arguing their proposals would damage his interests (despite no plan being publicly available at this preliminary plan-making stage). We (Planning Policy officers) have spoken to the Borough Council's legal team and the following points should be noted:

- The Parish Council has statutory powers, as a qualifying body;
- The Parish Council appoints an independent steering/ working group (NPG), to prepare a Neighbourhood Plan on their behalf;
- The Parish Council takes a decision to publish the Neighbourhood Plan for Regulation 14 consultation and ultimately submission to the Borough Council (Regulation 15);
- The NPG has an advisory role only (functioning as a working group) and has no decision making powers; therefore it cannot be seen that any plausible claim could be made by the landowner against individual representatives of the NPG.

Contact the Borough Council's Principal Conservation Officer, to obtain her advice about the process for making a Listed Building application for the Eastgate Street "clunch wall". Regarding the "clunch wall", would it be preferable or necessary for the Borough Council to make any application to have this listed, as it would have more gravitas coming from the Borough Council (as the statutory body with specific obligations to protect the historic environment)?

A: Anybody can apply to Historic England to have a building or structure listed. An application has no more or less gravitas coming from a local planning authority than it would coming from an individual, interest group or Parish Council.

The "clunch" wall is clearly a non-designated heritage asset (NDHA), being the last significant remaining structure from the Shouldham Hall estate. However, given that the wall has seen many alterations, it is unlikely to meet Historic England's requirements for listing. However, it is emphasised that the wall is a NDHA and, as such, would enjoy some protection through the planning system if significant alterations are sought by individual landowners.

I hope this provides the information and reassurance that you need to continue with Shouldham's Neighbourhood Plan journey. Please do not hesitate to get back to Sandra Homcenko (Graduate Planner/ lead officer for Neighbourhood Planning) or me if you have any queries.



On Thu, 27 Nov 2025 at 11:37, [redacted] <[redacted]@west-norfolk.gov.uk>

FAO Shouldham Neighbourhood Planning Group/ Shouldham Parish Council

Dear All

I write with reference to our meeting this morning (27th November). My understanding of the situation, from the points you have raised is as follows:

- Preliminary consultations/ engagement with landowners gave rise to unpleasant feedback (including threats of legal costs) from certain property owners
- Neighbourhood Planning Group/ Parish Council has always been concerned with community cohesion, so is already looking to remove certain initial proposals for Local Green Spaces (LGS) or non-designated heritage assets (NDHAs)
- Parish Clerk has advised that as Neighbourhood Planning Group is independent of Parish Council, they would not be covered by Parish Council's public liability/ indemnity insurance
- Neighbourhood Planning Group feels strongly about one proposed NDHA – Eastgate Street "clunch wall" that is outside the Conservation Area (if within Conservation Area, it may already enjoy some protection through the relevant legislation)

It was suggested that some tweaks to policy may address some concerns; e.g. a "softer" green corridor within the village "horseshoe". On behalf of the Borough Council, we (Cllr Jim Moriarty, Sandra and I) have listened to your thoughts and concerns and have agreed the following actions.

We (Borough Council officers, working with Cllr Moriarty) will seek specific advice from the Borough Council's Monitoring Officer about the legal status of the Neighbourhood Planning Group, and whether it would enjoy protection in the event that an individual/ landowner sought to take legal action against the Group (e.g. as volunteer individuals)?

We (Borough Council officers, working with Cllr Moriarty) will contact the Borough Council's Principal Conservation Officer, to obtain her advice about the process for making a Listed Building application for the Eastgate Street "clunch wall".

Regarding the "clunch wall", would it be preferable or necessary for the Borough Council to make any application to have this listed, as it would have more gravitas coming from the Borough Council (as the statutory body with specific obligations to protect the historic environment)? The process could be led by the Borough Council's Conservation team, but this would be dependent on whether there is a case for the "clunch wall" to be listed.

We will pick these points up with the relevant bodies in the coming days. We understand that the Parish Council is not seeking to go to consultation until the New Year, and the outstanding concerns the Neighbourhood Planning Group have been addressed. Meanwhile, we will keep you informed as/ when we have any further information.

[redacted]

[redacted]

[redacted]

Borough Council of
King's Lynn &
West Norfolk

